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January 20, 2022

By ECF

Hon. Nicholas G. Garaufis
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Daskal, No. 21 Cr. 110 (NGG)*

Dear Judge Garaufis:

I write on behalf of defendant Jacob Daskal to respectfully request an adjournment of the earlier scheduled pretrial motions dates. On January 14, 2022, the Court set a trial date in this matter for November 9, 2022. Because the parties believe it is useful to use the coming months to continue plea discussions before filing and litigating pretrial motions, we respectfully request an adjournment of the pretrial motions schedule. This also will avoid the unnecessary expenditure of judicial resources. Further, as communicated earlier to the Court, this case involves facts and witnesses located in Israel, and the defense believes the additional time before motions are filed will assist us in evaluating the foreign evidence that might be relevant and any need to conduct Rule 15 foreign depositions.

For these reasons, we seek a motions schedule still far enough in advance of the trial date to allow the Court sufficient time to review and rule on the motions, but also allow the parties to complete their work to see if a disposition is possible short of trial.

In this regard, given the November 2022 trial date, we propose the following schedule:

Defendant's Motions:	May 9, 2022
Government's Response:	June 13, 2022
Defendant's Reply:	June 27, 2022

We have conferred with the Government about our request to adjourn the motions schedule and it has no objection.

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Currently, the Court has scheduled the next Court date on March 31, 2022, at 2:30 p.m. If still convenient to the Court, we ask the Court to keep this date as a status conference to allow the parties to update the Court on any relevant issues.

The defendant consents to the exclusion of time under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), to allow him to undertake and complete plea negotiations, conduct foreign investigation and additional discovery review, and prepare any appropriate pretrial motions. We consent to an exclusion of time until the trial date of November 9, 2022.

I thank the Court for its consideration of these matters.

Respectfully submitted,



Henry E. Mazurek

Counsel for Defendant Jacob Daskal

CC: Government Counsel